

EXHIBIT 2

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<p>UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK</p> <p>-----x)</p> <p>AMERICAN BROADCASTING COMPANIES,) INC., DISNEY ENTERPRISES, INC.,) No. 19-cv-7136 TWENTIETH CENTURY FOX FILM) CORPORATION, CBS BROADCASTING INC.,) CBS STUDIOS INC., FOX TELEVISION) STATIONS, LLC, FOX BROADCASTING) COMPANY, LLC, NBCUNIVERSAL MEDIA,) LLC, UNIVERSAL TELEVISION LLC, and) OPEN 4 BUSINESS PRODUCTIONS, LLC,)</p> <p>) Plaintiffs,) vs.)) DAVID R. GOODFRIEND and SPORTS) FANS COALITION NY, INC.,)) Defendants.) -----x)</p> <p>REMOTE VIDEOTAPED DEPOSITION OF JOHN S. ORLANDO TUESDAY, DECEMBER 1, 2020 12:40 P.M. EASTERN STANDARD TIME</p> <p>Pages: 1 - 272 Reported by: Leslie A. Todd, CSR No. 5129 and RPR</p> <p>DIGITAL EVIDENCE GROUP 1730 M Street, NW, Suite 812 Washington, D.C. 20036 (202) 232-0646</p>	<p>1 C O N T E N T S 2 EXAMINATION OF JOHN S. ORLANDO PAGE 3 By Ms. Simons 7 4 5 E X H I B I T S 6 (Attached to transcript) 7 ORLANDO DEPOSITION EXHIBITS PAGE 8 No. 1 Highly Confidential Settlement Communication - Subject to Rule 408 9 Agreement 11 10 No. 2 Application for Digital Television Station Construction Permit, Bates 11 Nos. CBS0003429 to 0003442 93 12 No. 3 Article entitled "Next Generation TV is on the Horizon," National 13 Association of Broadcasters 123 14 No. 4 E-mail string re American Tower Completes Construction of Dallas 15 ATSC 3.0 SFN, Bates Nos. CBS0002402 to 0002404 126 16 No. 5 E-mail string re Stations Mum on Locast's OTT Bite in Big Apple, 17 Bates Nos. CBS0003364 to 0003365 133 18 No. 6 E-mail string re Locast on Roku, Bates Nos. CBS0003352 to 0003353 136 19 No. 7 E-mail string re Note from JPM Morgan on Locast, Bates No. 20 CBS0003338 138 21 22</p>
<p>Page 2</p> <p>1 A P P E A R A N C E S 2 3 ON BEHALF OF PLAINTIFFS: GERSON A. ZWEIFACH, ESQUIRE 4 THOMAS G. HENTOFF, ESQUIRE TIAN HUANG, ESQUIRE 5 WILLIAMS & CONNOLLY LLP 725 Twelfth Street, N.W. 6 Washington, D.C. 20005 (202) 434-5000 7 8 9 ON BEHALF OF DEFENDANTS: CAROLINE SIMONS, ESQUIRE 10 DAVID HOSP, ESQUIRE SHANE ANDERSON, ESQUIRE 11 ORRICK, HERRINGTON & SUTCLIFFE LLP 222 Berkeley Street 12 Suite 2000 13 Boston, Massachusetts 02116 (617) 880-1885 14 15 16 ALSO PRESENT: 17 DANIEL HOLMSTOCK, Videographer 18 19 20 21 22</p>	<p>Page 4</p> <p>1 E X H I B I T S C O N T I N U E D 2 (Attached to transcript) 3 ORLANDO DEPOSITION EXHIBITS PAGE 4 No. 8 J.P.Morgan Media article, "Can Locast Become a Disruptor to Broadcast Television," Bates Nos. 5 CBS0003341 to 0003348 139 6 No. 9 E-mail string re Free TV App Locast Needs Cash to Survive, Bates Nos. 7 CBS0002426 to 0002427 143 8 No. 10 E-mail string re Locast, a Free App Streaming Network TV, Would Love to Get Sued - The New York Times, Bates 9 No. CBS0003350 146 10 No. 11 Edmund Lee tweet re Locast, Bates No. CBS0003351 146 11 No. 12 E-mail string re Tomorrow, Bates No. CBS0002011 151 12 No. 13 E-mail string re CBS Affiliates Washington draft, Bates Nos. 13 CBS0002704 to 0002705 157 14 No. 14 2017 CBS Affiliates, Washington Cued Script v4, Bates Nos. CBS0002706 to 15 0002716 158 16 No. 15 E-mail string re Fwd: AT&T/DirecTV, Bates Nos. CBS0003303 to 0003304 181 17 No. 16 E-mail string re Fwd: AT&T Just Donated \$500,000 to Locast, Bates 18 Nos. CBS0 003329 to 0003330 186 19 No. 17 E-mail re AT&T Adds Locast App to DirecTV, U-Verse Platforms, Bates 20 No. CBS0002354 191 21 No. 18 E-mail string re AT&T's Revised CBS Proposal/subject to internal review/ 22 Confidential, Bates Nos. CBS0003616 to 0003618 194</p>

<p style="text-align: right;">Page 117</p> <p>1 A I believe that every CBS station does</p> <p>2 whatever is within the prescribed rules of the FCC</p> <p>3 and does everything within their, quote, power to</p> <p>4 reach every household in their market.</p> <p>5 Q Do CBS stations get complaints about</p> <p>6 poor signals or lack of signal from their viewers?</p> <p>7 A If a -- if a viewer gets a poor picture</p> <p>8 quality through cable, through satellite, through</p> <p>9 something else, the first -- the first place they</p> <p>10 would call would be the local station.</p> <p>11 I do know that there's actually been</p> <p>12 complaints from -- I recall there was a complaint</p> <p>13 from CBS station Denver who was attempting to view</p> <p>14 the CBS signal on Locast, and the first person</p> <p>15 they called when it was getting a lousy signal was</p> <p>16 the local station manager.</p> <p>17 So if -- if Comcast goes out when</p> <p>18 somebody is kicking the winning field goal,</p> <p>19 they're not going -- they're going to call the</p> <p>20 local station. That's generally their first place</p> <p>21 they call --</p> <p>22 THE REPORTER: I'm sorry. What did you</p>	<p style="text-align: right;">Page 119</p> <p>1 there, when -- if complaints came in, and I don't</p> <p>2 think they were -- I think they were fairly rare,</p> <p>3 they were usually -- I hesitate to call it viewer</p> <p>4 error, but they were generally something that</p> <p>5 could be resolved by working with the viewer as to</p> <p>6 what to do with their TV set.</p> <p>7 Q I understand.</p> <p>8 My question was, do CBS stations get</p> <p>9 complaints that are not attributable to something</p> <p>10 that can be resolved with working with the viewer</p> <p>11 to fix their TV set?</p> <p>12 A I -- I -- I couldn't give you any</p> <p>13 specific ones that I'm aware of.</p> <p>14 Q So you're able to give me specifics of</p> <p>15 every other scenario, but not of the particular</p> <p>16 scenario that I'm asking about, which is over-the-</p> <p>17 air signals over the antenna that have nothing to</p> <p>18 do with user error.</p> <p>19 MR. ZWEIFACH: Objection.</p> <p>20 Argumentative.</p> <p>21 THE WITNESS: My -- my --</p> <p>22 MR. ZWEIFACH: Is that a comment on his</p>
<p style="text-align: right;">Page 118</p> <p>1 say after, "That's generally their first place</p> <p>2 they call"?</p> <p>3 THE WITNESS: Is their local station.</p> <p>4 THE REPORTER: Thank you.</p> <p>5 THE WITNESS: Mm-hmm.</p> <p>6 BY MS. SIMONS:</p> <p>7 Q Do CBS stations also get complaints</p> <p>8 about poor over-the-air signals that they're</p> <p>9 receiving through their antenna?</p> <p>10 A I'm aware of -- you know, periodically I</p> <p>11 heard of some. Most of those come back to what I</p> <p>12 was referring to earlier at the various -- excuse</p> <p>13 me -- at the various FCC repacks, the stations</p> <p>14 would get some calls because they -- the viewer</p> <p>15 had to rescan their television set and didn't</p> <p>16 quite know how to do it.</p> <p>17 Q Do CBS stations get complaints about</p> <p>18 poor over-the-air signals that they are receiving</p> <p>19 through their antenna that is not attributable to</p> <p>20 user error or outdated scanning from their set?</p> <p>21 A You know, when -- let me try to answer</p> <p>22 it this way. Again, reflecting on when I was</p>	<p style="text-align: right;">Page 120</p> <p>1 testimony or is that a new question?</p> <p>2 MS. SIMONS: It's a question.</p> <p>3 MR. ZWEIFACH: Okay.</p> <p>4 THE WITNESS: So my -- my exposure to</p> <p>5 what I heard from station managers were primarily</p> <p>6 during the various repacks when I would be in</p> <p>7 regular touch with them as to what was going on</p> <p>8 with the -- with the repack and how -- how they</p> <p>9 were doing with the viewers in those markets.</p> <p>10 BY MS. SIMONS:</p> <p>11 Q Mr. Orlando, what is ATSC 3.0?</p> <p>12 A Don't ask me -- don't ask me to tell you</p> <p>13 what ATS -- ATSC stands for.</p> <p>14 3.0 is -- as I understand it, is a</p> <p>15 experimental new standard as to which -- they have</p> <p>16 IP-based internet protocol, based -- of which some</p> <p>17 broadcasters are, under FCC authorization, are</p> <p>18 experimenting with.</p> <p>19 I guess the best way to describe it</p> <p>20 perhaps is when, you know, there's a new broadcast</p> <p>21 standard from analog to digital, this is another</p> <p>22 one that some of the broadcasting industry is</p>

<p style="text-align: right;">Page 269</p> <p>1 CERTIFICATE OF CERTIFIED SHORTHAND REPORTER</p> <p>2 The undersigned Certified Shorthand Reporter</p> <p>3 does hereby certify:</p> <p>4 That the foregoing proceeding was taken before</p> <p>5 me remotely via Zoom videoconferencing at the time</p> <p>6 therein set forth, at which time the witness was</p> <p>7 duly sworn; That the testimony of the witness and</p> <p>8 all objections made at the time of the examination</p> <p>9 were recorded stenographically by me and were</p> <p>10 thereafter transcribed, said transcript being a</p> <p>11 true and correct copy of my shorthand notes</p> <p>12 thereof; That the dismantling of the original</p> <p>13 transcript will void the reporter's certificate.</p> <p>14 In witness thereof, I have subscribed my name</p> <p>15 this date: December 4, 2020.</p> <p>16</p> <p>17</p> <p>18 <u>LESLIE A. TODD, CSR, RPR</u></p> <p>19 Certificate No. 5129</p> <p>20</p> <p>21</p> <p>22</p>	<p style="text-align: right;">Page 271</p> <p>1 Digital Evidence Group, L.L.C.</p> <p>2 1730 M Street, NW, Suite 812</p> <p>3 Washington, D.C. 20036</p> <p>4 (202) 232-0646</p> <p>5</p> <p>6 SIGNATURE PAGE</p> <p>7 Case: American Broadcasting Companies, Inc., et al. v. Goodfriend, et al.</p> <p>8 Witness Name: John S. Orlando</p> <p>9 Deposition Date: December 1, 2020</p> <p>10</p> <p>11 I do hereby acknowledge that I have read</p> <p>12 and examined the foregoing pages</p> <p>13 of the transcript of my deposition and that:</p> <p>14</p> <p>15 (Check appropriate box):</p> <p>16 () The same is a true, correct and</p> <p>17 complete transcription of the answers given by</p> <p>18 me to the questions therein recorded.</p> <p>19 () Except for the changes noted in the</p> <p>20 attached Errata Sheet, the same is a true,</p> <p>21 correct and complete transcription of the</p> <p>22 answers given by me to the questions therein</p> <p>recorded.</p> <p>DATE WITNESS SIGNATURE</p> <p>DATE NOTARY</p>
<p style="text-align: right;">Page 270</p> <p>1 John S. Orlando, c/o</p> <p>2 WILLIAMS & CONNOLLY LLP</p> <p>3 725 Twelfth Street, N.W.</p> <p>4 Washington, D.C. 20005</p> <p>5</p> <p>6 Case: American Broadcasting Companies, Inc., et al. v. Goodfriend, et al.</p> <p>7 Date of deposition: December 1, 2020</p> <p>8 Deponent: John S. Orlando</p> <p>9</p> <p>10 Please be advised that the transcript in the above</p> <p>11 referenced matter is now complete and ready for signature.</p> <p>12 The deponent may come to this office to sign the transcript,</p> <p>13 a copy may be purchased for the witness to review and sign,</p> <p>14 or the deponent and/or counsel may waive the option of</p> <p>15 signing. Please advise us of the option selected.</p> <p>16 Please forward the errata sheet and the original signed</p> <p>17 signature page to counsel noticing the deposition, noting the</p> <p>18 applicable time period allowed for such by the governing</p> <p>19 Rules of Procedure. If you have any questions, please do</p> <p>20 not hesitate to call our office at (202)-232-0646.</p> <p>21</p> <p>22 Sincerely,</p> <p>Digital Evidence Group</p> <p>Copyright 2020 Digital Evidence Group</p> <p>Copying is forbidden, including electronically, absent</p> <p>express written consent.</p>	<p style="text-align: right;">Page 272</p> <p>1 Digital Evidence Group, LLC</p> <p>2 1730 M Street, NW, Suite 812</p> <p>3 Washington, D.C. 20036</p> <p>4 (202)232-0646</p> <p>5</p> <p>6 ERRATA SHEET</p> <p>7</p> <p>8 Case: American Broadcasting Companies, Inc., et al. v. Goodfriend, et al.</p> <p>9 Witness Name: John S. Orlando</p> <p>10 Deposition Date: December 1, 2020</p> <p>11 Page No. Line No. Change</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>Signature Date</p>